

## ILLINOIS COMMERCE COMMISSION

NANPA, on behalf of the Illinois	)	
Telecommunications Industry	)	
	)	Docket No. 00-0677
	)	
Petition for Approval of Numbering Plan	)	
Area Relief Planning for the 618 Area Code	)	

### **JOINT BRIEF OF VERIZON WIRELESS AND CINGULAR WIRELESS IN RESPONSE TO BRIEF OF HOME TELEPHONE COMPANY, HARRISONVILLE TELEPHONE COMPANY, AND GRAFTON TELEPHONE COMPANY**

Verizon Wireless and Cingular Wireless, by their attorneys, hereby submit their Joint Response to the Brief of Home, Harrisonville and Grafton Telephone Companies.

#### **INTRODUCTION**

On February 15, 2002, following hearing, Home Telephone Company ("Home"), Harrisonville Telephone Company ("Harrisonville") and Grafton Telephone Company ("Grafton") filed a brief in Docket 00-0677, advocating that the Illinois Commerce Commission ("Commission") adopt a geographic split in the 618 NPA.

#### **ARGUMENT**

In paragraph 3 of their Brief, Home, Harrisonville and Grafton represent that most of the parties in this matter ". . . can accept either Split Alternate 6 with the modification suggested by Ameritech to move its Carlyle exchange to Area A or Split Alternate 12 with the modification suggested by Verizon to move its Marissa exchange to Area B." (Home

Telephone Company, Harrisonville Telephone Company and Grafton Telephone Company Brief at pages1-2).

To the extent that Home, Harrisonville and Grafton are attempting to represent the parties' positions on where the split line should be placed should the Commission order a geographic split, this representation is accurate. However, a clearer depiction of Verizon Wireless's and Cingular Wireless's witnesses' testimony is that acceptance of any geographic split in the 618 NPA, wherever the line is drawn, is a less desirable plan than an all-services distributed overlay. Testimony regarding where a geographic split line should be placed was offered in response to the Commission and the ALJ's request for the "second choices" of the parties for relief in the 618 NPA.

Verizon Wireless, Cingular Wireless, and many of the other parties to this docket have consistently supported, and continue to support, the consensus position reached by the industry group that the all-services distributed overlay relief option (Alternative No. 3 described in NeuStar's petition in this Docket) is the best 618 NPA relief solution for both customers and the industry.

### **CONCLUSION**

The all-services distributed overlay is the best solution for relief in the 618 NPA. While Home, Harrisonville and Grafton have stated a preference for a split, any representations of the position of most parties relative to placement of the line for a geographic split in the 618 NPA are based on questioning as to the preferred "second choice"

of the parties. Verizon Wireless and Cingular Wireless urges the Commission to allow implementation of the all-services distributed overlay to proceed as soon as possible.

Respectfully Submitted,

VERIZON WIRELESS

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing **Joint Brief of Verizon Wireless and Cingular Wireless in Response to Brief of Home Telephone Company, Harrisonville Telephone Company and Grafton Telephone Company** was served via e-mail upon the parties of record herein this 22nd day of February, 2002:

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